



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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January 4, 2010

David Libman
National Park Service Southeast Region
Atlanta Federal Center
1924 Building
100 Alabama Street, S.W.
Atlanta, Georgia 30303

SUBJECT: Draft General Management Plan/Environmental Impact Statement for the
Cumberland Gap National Historical Park in Middlesboro, Kentucky;
CEQ Number 20090371

Dear Mr. Libman:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft General Management Plan/Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The purpose of this general management plan and Draft EIS is to present a plan for managing the Cumberland Gap National Historical Park (CGNHP) in Middlesboro, Kentucky, for the next 15 to 20 years. The National Park Service (NPS) is the lead federal agency for the proposed action.

General management plans represent the broadest level of planning conducted by the NPS and are intended to provide overall guidance for making informed decisions about future conditions in national parks. The Draft EIS assesses the environmental impacts of three alternatives (A, B, & C) in terms of levels of service for visitor interpretation and education in the CGNHP, suitable locations for administration and visitor facilities, and management of the CGNHP to allow for preservation of natural and cultural resources. Alternative A is the no action alternative, continuation of present management practices. Alternative B would provide opportunities for enhanced visitor access by providing additional park facilities. Alternative C is identified as the NPS preferred alternative and is similar to Alternative B. However, it would also provide additional park facilities, increased levels of education, outreach, and formalized partnering efforts.

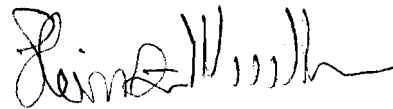
The concept of Alternative C is to provide greater opportunities for visitor access and facilities in the park. This would be achieved primarily by having larger developed zones than the other alternatives. The total area of the developed zone in Alternative C would be over twice as large as the development zone in Alternative A, the no action alternative. Therefore, Alternative C would have a greater relative amount of land disturbing activity, as compared to the other alternatives, due to an increase in "hardened" types of access (e.g., parking areas, roads,

and camping areas) and development of support facilities. However, the numbers and types of new facilities would be limited to protect natural and cultural resources in the park. New facilities would be proposed within the context of their location within the management zone. Sustainable designs and practices would be implemented wherever possible, and new facilities would be unobtrusive.

A number of mitigation measures are proposed in the Draft EIS to avoid or minimize potentially adverse impacts from implementation of the new management plan and to ensure that the park's natural and cultural resources are protected and preserved for future visitors. EPA supports inclusion of these mitigation measures as part of the new general management plan for CGNHP, particularly the commitment to develop a resource stewardship strategy, including an updated cave management plan. EPA recommends that these programs include significant monitoring activities to ensure that the increase in hardened access areas and likely subsequent increase in recreational and educational usage of the park do not negatively impact natural and cultural resources. This is especially true for the expansion of the developed zone adjacent to Fern Lake, which is a designated public water-supply reservoir.

We rate this document LO (Lack of Objections). EPA lacks objections to the proposed project and believes that the Draft EIS provided adequate information on the environmental impacts. All mitigation measures and monitoring programs, as described in the Draft EIS and including the above recommendations, should be fully implemented. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Cumberland Gap National Historic Park